

PU Europe reaction to the

Public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework

INFORMATION ABOUT THE RESPONDENT

We are responding to this questionnaire as an
Name of the organisation:OrganisationTransparency register ID:27993486325-38Our principal country of residence or activity:BelgiumPlease specify which other country:All EU Member States

<u>How would you prefer your contribution to be published on the Commission website?</u> Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. Energy efficiency targets and measures

- 1. Do you think the right approach in addressing the shortfall is:
- **X** a) To define energy efficiency target(s)
- **X** b) Reinforced implementation of existing legislation, including active policy on infringements
- X c) Proposing new legislation
- 0 d) other

1.a.1. How should these target(s) be expressed?

- O In terms of energy intensity improvements of the economy and economic sectors
- O As absolute energy savings
- As a hybrid of the two represents a better benchmark upon which to frame a 2030 objective
 No opinion

1.a.	2. At what level shou	Id they	apply?			
X	EU	X	National	Х	Sectoral	
1.a.	3. Should they be:					
X	Legally binding	Х	Indicative	0	No opinion	

Further comments on targets

Slogans such as 20-20-20 by 2020 are not credible. Targets must be based on a bottom-up approach reflecting real cost-effective saving potentials per sector/country. Fraunhofer calculated sectoral cost-effective end-use saving potentials by 2030. With 61%, "Residential" offers by far the highest potential, followed by transport with 41%. All potentials result in an overall 41% reduction compared to the Primes 2009 baseline for final energy. The cost-effective sectoral saving potentials could be added up to overall energy savings to be achieved in support of the EU's GHG target. Sectoral targets should only be binding if market and other barriers prevent the realisation of savings potentials. This is the case for buildings. Sectoral targets must be expressed according to sectoral peculiarities. The target for buildings should be fixed as absolute savings expressed in energy demand per m²/year.

Please specify your response b)

There is a lack of effective and rigorous implementation of existing EU legislation on buildings. The recast EPBD is still not completely implemented across Europe. This includes the definition of nearly zero energy buildings, the use of energy performance certificates, the setting of component requirements, the application of the concept of major renovations and the adjustment of building code requirements to cost optimal levels.

As regards the EED, many Member States are unlikely to develop and implement meaningful longterm building renovation roadmaps in time and apply the three percent renovation rate for central government buildings. A complete transposition of article 7 on energy efficiency obligations is also questionable.

Please specify your response c)

As to buildings, no new directive is needed but both EPBD and EED should be strengthened in order to realise the substantial savings potential of the existing building stock. In particular, the EPBD needs to become far more detailed on renovation with a view to reducing the energy demand of existing buildings by 80% by 2050 and stimulating (staged) deep renovation.

The EED should include binding 2020 and 2030 energy efficiency targets for buildings and determine an annual renovation rate of 3% p.a for the EU's building stock.

Β. **Energy efficiency sectors**

2. Do y	you think that	t furthe	r policy measu	res are	needed at EU level to foster energy
X	Yes	0	No	0	No opinion

Please give details:

Buildings offer the highest saving potential but market failures prevent implementation in practice. Renovation must be addressed in a coherent way providing a clear and ambitious long-term framework (2050) while keeping in mind 2020 and 2030 as milestones. This is best achieved through a binding energy efficiency target for buildings accompanied by coherent measures to trigger mass-scale renovation of existing buildings. A revised EPBD should include more detailed renovation requirements (including -staged- deep renovation). NZEB definitions should be harmonised and Energy Performance Certificates strengthened (making them "building passports", including all relevant information), a central, publicly available, EPC registry established in MS and a minimum energy rating for rented buildings set. The EED should extend the renovation rate of 3% to all buildings. Supplier obligations should specifically support renovation investments and have to be continued after 2020.

0	Yes	Х	No	0	No opinion	
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Plea	se give deta	ils:				
Whil	e industry cer	tainly has	a tangible e	nergy savin	s potential, several studies conve	erge on the fac
hat	it is lower tha	n that of	other sectors	s. Market fa	ures in addressing energy efficier	ncv notentials
aro	lower than in	other sect	ors with man	y companie	implementing rigorous internal	enerav savina
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proč	rammes. All C	ompanies	are subject	to regular e	lergy addits under the EED and a	rsignificant
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4. D	o you think	that furth	ner policy m	neasures a	e needed at EU level to foster	energy
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х

No

No opinion

6. Do you think that further policy measures are needed at EU level to foster energyefficiency in generation and distribution?OYesONoXNo opinion

7. Do you think that further financial mechanisms and instruments are needed at EU levelto mobilise energy efficiency investments?X YesONoONoONo opinion

Please give details:

As to buildings, public and private investment flowing into energy efficiency is insufficient today. Member States will not meet their 2020 and long-term efficiency targets, unless this is scaled up. An ambitious long-term vision based on a stable legal framework and a building efficiency target can create much needed investor certainty.

The best use of Structural and Investment funds 2014-2020 and Horizon 2020 should be ensured so as to increase finance availability and technical capacity. These funds should target energy efficiency investments and use public money to lever private funding. Access to EU funding must be conditional on full implementation of EU legislation within the climate and energy area. Technical EU-level assistance programmes like ELENA should be made available also to private sector building projects, e.g. housing associations.

State Aid Rules should not hamper the use of public funds to support public and private (commercial) energy efficiency projects.

8. Do you think that further measures are needed to build the capacity of actors in the
energy efficiency sector?XYesONoONo opinion

Please give details:

As regards buildings, energy efficiency actors will build up capacity if the regulatory environment offers an ambitious and stable long-term vision. In particular, a highly fragmented sector such as the building industry requires a binding long-term target (-80% energy demand of the building stock by 2050) with intermediate goals to measure progress. Stop-and-go effects in support schemes must be avoided and market surveillance strengthened.

9. What are the most promising technology solutions that can help deliver energy savings in the 2020 and 2030 time horizon? How can their development and uptake be supported at EU level?

Buildings offer the highest cost efficient saving potential and should be prioritised. Although new high-performance products / systems are in development, today's technologies can already achieve zero energy demand for new build and renovation projects. This is achieved through a well-designed combination of different technologies. No ranking is impossible. It is however important to respect the Trias Energetica according to which the building's energy demand should minimised as a first step (building fabric first, then controls etc.), followed by the use of renewable energy sources and, if required, topped up by the efficient use of fossil energy sources.

Improved design and prefabrication as well as up-stream project team partnering will be major enablers.

The development and uptake of new technologies can best be supported by putting in place an ambitious long-term regulatory framework, mainly through a binding building efficiency target and measures to stimulate deep renovation.

10. Further comments:

The discount rates assumed for energy efficiency measures in existing modelling must be reduced in order to be more realistic and prevent exaggeration of the costs of these measures. Benefits, including co-benefits (job creation, fostering economic activity in crisis-vulnerable sectors such as construction, improved living conditions (health), benefits for public budgets, etc), from energy savings must be taken into account.

Brussels, 28th April 2014